

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**ZT IP, LLC**

**Plaintiff,**

**v.**

**VMWARE, INC.,**

**Defendant.**

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**Case No. 3:22-cv-970-X**

**ZT IP, LLC’S OPPOSED MOTION FOR WITHDRAWAL OF COUNSEL**

William Ramey, individually, and Ramey LLP (collectively, “Ramey Lawyers”), counsel for Plaintiff ZT IP, LLC in this matter, move the Court for leave to withdraw as counsel for ZT IP, LLC.

Defendant VMware’s recent Motion to Amend Judgment (Dkt. 46) and Motion to Join Parties (Dkt. 45) seek relief from this Court to add William Ramey and Ramey LLP as parties and to hold the Ramey Lawyers jointly and severally liable with ZT IP, LLC for the fee award made by this Court under 35 U.S.C. § 285. (Dkt. 43). Based on these recent circumstances, the Ramey Lawyers seek to withdraw from representing ZT IP, LLC.

In accordance with Local Civil Rule 83.12, Warren V. Norred of Norred Law, PLLC, 515 E. Border, Arlington, Texas 76010, (817) 704-3984, will represent ZT IP, LLC as the succeeding attorney, and Mr. Warren has already made an appearance for ZT IP, LLC in this cause (Dkt. 51).

A proposed Order for the relief sought is attached hereto.

Dated: September 22, 2023

Respectfully submitted,

By: /s/ William Ramey

William Ramey

Texas State Bar No. 24027643

RAMEY LLP

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**ATTORNEYS FOR PLAINTIFF ZT IP,  
LLC**

**CERTIFICATE PURSUANT TO LOCAL CIVIL RULE 83.12**

I certify that ZT IP, LLC approves the withdrawal of the Ramey Lawyers in this case.

/s/ William Ramey

William Ramey

**CERTIFICATE OF CONFERENCE**

I certify that I conferred with counsel for VMware, Inc. regarding this Motion to Withdraw by e-mail on September 22, 2023 and counsel stated that they needed more time to respond. Therefore, the motion is filed as opposed.

/s/ William Ramey

William Ramey

**CERTIFICATE OF SERVICE**

I certify that on September \_\_, 2023 using the CM/ECF system, which sent notification of such filing to all counsel of record who have registered with the CM/ECF system.

/s/William Ramey

William Ramey